CERTIFICATE PURSUANT TO 47 C.F.R. § 64.2009(e)

I, Steven R. Bryan, certify:

I am the President of Pinnacles Telephone Co., a rural incumbent local exchange carrier serving portions of San Benito County in the State of California. I am authorized to make the following certification on behalf of Pinnacles Telephone Co.

I am familiar with the Federal Communications Commission's rules in Subpart U of Part 64 of Title 47 of the Code of Federal Regulations. I have personal knowledge that, as of the date of this certificate, Pinnacles Telephone Co. has established operating procedures that are adequate to ensure compliance with the rules in Subpart U of Part 64 of Title 47 of the Code of Federal Regulations.

I certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 2nd of February, 2006 at Paicines, California.

President

Pinnacles Telephone Co.

340 Live Oak Road, Paicines, CA 95043

831-389-4500 or pinntel@garlic.com

FCC File EB-06-TC-060 Certification of CPNI Filing February 2, 2006

PINNACLES TELEPHONE CO. STATEMENT REGARDING: COMPLIANCE WITH FCC CPNI RULES FEBRUARY 2, 2006

The following statement explains how operating procedures observed by Pinnacles Telephone Co. (Pinnacles) ensure that it is in compliance with the rules in Subpart U of Part 64 of Title 47 of the Code of Federal Regulations.

In the twelve months ending December 31, 2005, Pinnacles Telephone Co. did not use Customer Proprietary Network Information ("CPNI") to market services. Pinnacles Telephone Co.'s current policy is to refrain from using CPNI for marketing purposes. By declining to use CPNI for any of the circumscribed purposes identified in Subpart U of Part 64 of Title 47 of the Code of Federal Regulations, Pinnacles Telephone Co. has not undertaken to obtain customer consent to use CPNI and, therefore, requires no formal system in place to differentiate those customers who have granted consent to use their CPNI and those customers who have not granted such consent.

Pinnacles Telephone Co. has the following protection measures in place. First, Pinnacles Telephone Co. has filed state tariff rules and procedures that address the protection of confidential subscriber information, including CPNI. Second, Pinnacles Telephone Co. undertakes periodic reviews of company practices to ensure that Pinnacles Telephone Co. remains in compliance with CPNI rules. Third, Pinnacles Telephone Co. requires that each of its employees adhere to company policies protecting confidential subscriber information. Forth, Pinnacles Telephone Co. trains its customer representatives to conform to confidentiality practices.